

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*
3 Sophia S. Lau, Esq., Nevada Bar No. 13365
4 *slau@earlysullivan.com*
5 EARLY SULLIVAN WRIGHT
6 GIZER & McRAE LLP
7 8716 Spanish Ridge Avenue, Suite 105
8 Las Vegas, Nevada 89148
9 Telephone: (702) 331-7593
10 Facsimile: (702) 331-1652

11 Attorneys for Defendant
12 OLD REPUBLIC NATIONAL TITLE INSURANCE
13 COMPANY

14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 DEUTSCHE BANK NATIONAL TRUST
17 COMPANY, AS INDENTURE TRUSTEE
18 UNDER THE INDENTURE RELATING TO
19 IMH ASSETS CORP., COLLATERALIZED
20 ASSET-BACKED BONDS, SERIES 2005-7,

21 Plaintiff,

22 vs.

23 OLD REPUBLIC TITLE INSURANCE
24 GROUP, INC., et al.,

25 Defendants.

Case No.: 2:20-cv-02009-GMN-DJA

**STIPULATION AND PROPOSED
ORDER EXTENDING DEFENDANT
OLD REPUBLIC NATIONAL TITLE
INSURANCE COMPANY'S TIME TO
RESPOND TO DEUTSCHE BANK'S
OPPOSITION TO OLD REPUBLIC
NATIONAL TITLE INSURANCE
COMPANY'S MOTION TO DISMISS
[ECF No. 30]**

(Second Request)

COMES NOW Defendant Old Republic National Title Insurance Company (“Old Republic”) and Plaintiff Deutsche Bank National Trust Company, as Indenture Trustee Under the Indenture Relating to IMH Assets Corp., Collateralized Asset-Backed Bonds, Series 2005-7 (“Deutsche Bank”) (collectively, the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

1. On December 10, 2020, Old Republic filed a Motion to Dismiss [ECF No. 15];
2. On March 18, 2021, Deutsche Bank filed its response in opposition to Old Republic’s motion to dismiss [ECF No. 30];
3. Old Republic’s deadline to file its reply memorandum responsive to Deutsche Bank’s opposition to Old Republic’s motion to dismiss is currently April 8, 2021;
4. Old Republic’s counsel is requesting a brief extension of time to file the aforementioned reply memorandum, through and including April 15, 2021, to afford Old Republic’s counsel additional time to review, analyze, and respond to the legal arguments set forth in Deutsche Bank’s brief;
5. Deutsche Bank does not oppose the requested extension;
6. This is the second request for an extension which is made in good faith and not for purposes of delay;

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1 **IT IS SO STIPULATED** that Old Republic's deadline to respond to Deutsche Bank's
2 opposition to Old Republic's motion to dismiss [ECF No. 30] is hereby extended through and
3 including April 15, 2021.

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5 Dated: April 5, 2021

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

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7 By: /s/-- Sophia S. Lau
8 SCOTT E. GIZER
9 SOPHIA S. LAU
Attorneys for Defendant OLD REPUBLIC
NATIONAL TITLE INSURANCE COMPANY

10
11 Dated: April 5, 2021

WRIGHT FINLAY & ZAK, LLP

12 By: /s/-Lindsay D. Robbins
13 DARREN T. BRENNER
14 LINDSAY D. ROBBINS
Attorneys for Plaintiff DEUTSCHE BANK
NATIONAL TRUST COMPANY

15 **IT IS SO ORDERED:**

16
17 Dated: April 6, 2021

18 By: 
19 UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE

I hereby certify that on April 5, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN
An Employee of EARLY SULLIVAN
WRIGHT GIZER & McRAE LLP

